

RAAB, STURM & GANCHROW, LLP

COUNSELORS AT LAW

2125 CENTER AVENUE, SUITE 100

FORT LEE, NEW JERSEY 07024

Tel: (201)292-0150

Fax: (201)292-0152

RONALD RAAB*
IRA A. STURM****
ARI D. GANCHROW**

MAURA E. BREEN***
SAMUEL R. BLOOM*****

* ADMITTED IN NY
** ADMITTED IN NY AND NJ
*** ADMITTED IN NY AND CT
**** ADMITTED IN NY AND FLA
***** ADMITTED IN NY, NJ AND MD

September 13, 2019

VIA ECF ELECTRONIC FILING

Hon. John G. Koeltl, U.S.D.J.
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 14A
New York, New York 10007

**Re: Building Service 32BJ Health Fund, et al. v. Certified Building Services Inc.,
Civil Action No. 19-cv-6173**

Dear Judge Koeltl:

Our firm is counsel for the Building Service 32BJ Benefit Funds, the Plaintiffs in this matter. The Funds ask that Defendant's deadline to answer or otherwise respond to the Complaint be extended thirty days, to October 16, 2019. This is the second request for an adjournment. Further, in light of this request the Funds ask that the Initial Conference scheduled before Your Honor for September 25, 2019 be adjourned to some date after October 16th.

This case centers around a payroll compliance audit of Defendant Certified Building Services, Inc. ("Defendant") commenced by the Funds' Auditing Firm. Since the filing of this Complaint, the parties have engaged in settlement discussions. These settlement discussions have focused on what business documents are needed by the Auditing Firm to perform said audit, and which documents are in Defendant's possession. However, these discussions have been hindered somewhat because it is my understanding that Defendant recently moved offices and is in the process of unpacking and organizing its records. Understandably, this has caused a delay in our attempts to settle this matter. That said, the parties are optimistic that they will be able to informally resolve their disputes. Toward that end, we ask for the thirty day extension.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, consisting of a stylized 'S' and 'B' followed by a horizontal line.

Samuel R. Bloom

cc: Matthew W. Fogleman, Esq. (via electronic mail)